

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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OFFICE OF SECRETARY

In the Matter of)
)
Administration of the) CC Docket No. 92-237
North American Numbering Plan)

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COMMENTS OF GTE

GTE Service Corporation ("GTE"), on behalf of its affiliated domestic telephone operating and wireless companies, hereby responds to the Commission's request for further comments as to whether or not the appropriate length for the transition (permissive dialing period) from three to four-digit Carrier Identification Codes ("CICs") has been affected by the passage of the Telecommunications Act of 1996 ("1996 Act").¹

DISCUSSION

In its original Notice of Proposed Rulemaking ("NPRM")² the Commission proposed a permissive dialing period of six years for the transition of Feature Group D ("FGD") CICs from three to four digits. In its Comments,³ GTE objected to an arbitrary six-year transition period for two basic reasons. The first was that the transition would have to end for technical reasons after the 5XXX and 6XXX

¹ Public Notice, DA 96-678 (released April 30, 1996).

² FCC 94-79

³ Comments of GTE, filed June 7, 1994

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series of CICs had all been assigned and activated. If the transition did not end, and new four-digit CICs were introduced, Local Exchange Carriers ("LECs") would be required to incur substantial expenditures for time-consuming modifications to switching, database, and billing systems in order to prevent a significant increase in post-dial delay.⁴ The second reason why GTE objected was because dialing parity would not exist during the transition period, giving entrenched service providers an unearned competitive advantage over newer service providers because their services would be accessible via five-digit Carrier Access Codes ("CACs") (*i.e.*, by dialing 10XXX) while the services of new competitors would be accessible via seven-digit CACs (*i.e.*, by dialing 101XXXX).⁵

GTE believes that the changes ushered in by the passage of the 1996 Act underscore the need for a transition period much shorter than six years. The demand for CICs generated by the flood of new service providers will quickly exhaust the 5XXX/6XXX CICs currently available. As of March 31, 1996, 307 of these CICs had been assigned by the North American Numbering Plan Administrator ("NANPA"). This number would have been much larger had the Commission not directed the NANPA to restrict CIC assignments to one CIC per applicant.⁶ Before this restriction, applicants had been allowed up to six CICs

⁴ *Id.* at pp. 15-20.

⁵ *Id.* at p. 20.

⁶ See Letter from Kathleen M.H. Wallman to Ronald R. Conners, Director of NANP Administration, dated March 17 1995.

under Industry Carrier Compatibility Forum ("ICCF") guidelines.⁷ Had the restriction not been in place, 1842 CICs (307 + [5 x 307]) might well have been assigned, nearly exhausting the approximately 2000 available.⁸ In order to accommodate this tremendous demand in an efficient and competitively neutral fashion, the transition to four digit CICs should end no later than December 31, 1996.⁹ Once the transition has ended, new four-digit CICs can be assigned without requiring the LECs to incur substantial expenditures for the time-consuming modifications noted above.¹⁰

Aside from issues of demand, continuation of the one-CIC-per-applicant restriction will have a detrimental impact on competition because multiple CICs will be needed by new providers to enjoy the full complement of routing and billing efficiencies enjoyed by their multi-CIC competitors. Moreover, to the extent the dialing parity required by Section 251(b)(3) of the 1996 Act does not yet exist in particular areas, competition will be dampened because a seven-digit CAC will be required to access the services of new providers while access to the services of incumbent providers will require only five-digit CACs.

⁷ See INC 95-0127-006.

⁸ GTE believes that because most companies are aware of the one-CIC-per-applicant restriction, many have not even attempted to apply for additional CICs that may be needed.

⁹ In addition to the heightened demand resulting from the 1996 Act, intraLATA toll competition in various states has and will continue to generate new demand for CIC assignments by entities that previously had no need for them (most notably the over 1200 existing LECs).

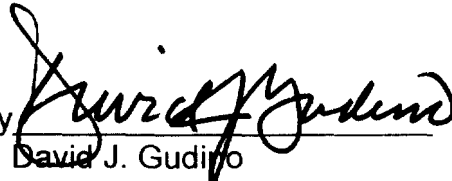
¹⁰ As GTE noted in its Reply Comments to the NPRM (at p. 8), the industry has been aware of the need to move to four digit CICs since 1988.

In light of the above, GTE believes the Commission should require the transition to four-digit CICs to terminate no later than December 31, 1996. So long as permissive dialing is allowed to continue, assignments of four-digit CICs beyond the 5XXX/6XXX series cannot be made without substantial expenditures and time-consuming upgrades by LECs. Moreover, the current one-CIC-per-company restriction cannot continue in light of the pressing need for multiple CICs by both existing and new service providers.

Respectfully submitted,

GTE Service Corporation,
on behalf of its affiliated domestic
telephone operating and wireless
companies

By



David J. Gudino
1850 M Street, N.W.
Suite 1200
Washington, D.C. 20036
(202) 463-5212

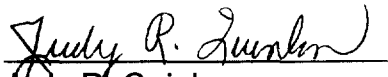
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May 20, 1996

ITS ATTORNEY

Certificate of Service

I, Judy R. Quinlan, hereby certify that copies of the foregoing "Comments of GTE" have been mailed by first class United States mail, postage prepaid, on May 21, 1996 to all parties of record.


Judy R. Quinlan